

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

KEITH RANIERE, et al.,

Defendants.

[PROPOSED]

LIMITED UNSEALING ORDER

Docket No. 18-CR-204 (S-1) (NGG)
(VMS)

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Upon the December 7, 2018 application of Richard P. Donoghue, United States Attorney for the Eastern District of New York, by Assistant United States Attorneys Moira Kim Penza and Tanya Hajjar, for a limited unsealing order authorizing the government to disclose on December 24, 2018 three partially sealed search warrants, and the affidavits filed in support of the search warrants, under Docket Numbers 18-MISC-981, 18-MISC-982, 18-MISC-1018 (hereinafter, the “WARRANTS”) to trial defendants Keith Ranieri, Clare Bronfman and Nancy Salzman, respectively (hereafter, the “TRIAL DEFENDANTS”) and their respective counsel of record in the above-captioned matter for the limited purpose of assessing whether to raise a legal challenge to the WARRANTS, and deferring disclosure of the WARRANTS until that date, and full consideration having been given to the matters set forth therein,

IT IS HEREBY ORDERED that, without further order of the Court, on December 21, 2018, a limited unsealing of the WARRANTS will become effective. On that date, the government may furnish copies of the WARRANTS to the TRIAL DEFENDANTS

and their respective counsel of record in the above-captioned matter (hereafter, “COUNSEL OF RECORD”).

IT IS FURTHER ORDERED that the government may defer disclosure of the WARRANTS to the TRIAL DEFENDANTS until December 21, 2018, when the limited unsealing order will become effective.

IT IS FURTHER ORDERED that the WARRANTS and any other documents filed under seal in Docket Numbers 18-MISC-981, 18-MISC-982, 18-MISC-1018 shall remain otherwise sealed to the extent they are currently, and no further disclosure of any of such documents shall be made by any person, including the TRIAL DEFENDANTS and COUNSEL OF RECORD, without authorization of a judge of competent jurisdiction.

IT IS FURTHER ORDERED that, if COUNSEL OF RECORD wish to attach or describe the contents of the WARRANTS in any submission to the Court, including but not limited to any motion to suppress, such attachments and descriptions shall be filed under seal, until further order of the Court.

IT IS FURTHER ORDERED that the TRIAL DEFENDANTS and COUNSEL OF RECORD shall not remove, transfer, transmit, or travel with any of the WARRANTS in any form, including paper and electronic, to any location outside of the United States, without authorization of a judge of competent jurisdiction.

Dated: Brooklyn, New York
_____, 2018

The Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York